

DISCOVERY PLAN WORKSHEET

Phase I (Pre-Settlement Discovery)

Deadline for completion of Rule 26(a) initial disclosures and HIPAA-complaint records authorizations:

January 3, 2017

Completion date for Phase I Discovery as agreed upon by the parties:
(Reciprocal and agreed upon document production and other discovery necessary for a reasoned consideration of settlement. Presumptively 60 days after Initial Conference.)

February 17, 2017

Date for initial settlement conference:

(Parties should propose a date approximately 10-15 days after the completion of Phase I Discovery, subject to the Court's availability)

March 3, 2017

Phase II (Discovery and Motion Practice)

Motion to join new parties or amend the pleadings:

(Presumptively 15 days post initial settlement conference)

March 20, 2017

First requests for production of documents and for interrogatories due by:

(Presumptively 15 days post joining/amending)

March 20, 2017

All fact discovery completed by:

(Presumptively 3.5 months post first requests for documents/interrogatories)

July 10, 2017

Exchange of expert reports completed by:

(Presumptively 30 days post fact discovery)

August 10, 2017

Expert depositions completed by:

(Presumptively 30 days post expert reports)

September 11, 2017

COMPLETION OF ALL DISCOVERY BY:

(Presumptively 9 months after Initial Conference)

SEPTEMBER 20, 2017

Final date to take first step in dispositive motion practice:

(Parties are directed to consult the District Judge's Individual Rules regarding such motion practice. Presumptively 30 days post completion of all discovery)

October 30, 2017

Do the parties wish to be referred to the EDNY's mediation program pursuant to Local Rule 83.8?

No.